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REMOVAL SUPPORT TEAM 2 EPA CONTRACT EP-W-06-072

December 26, 2013

Mr. Angel Rodriguez, On-Scene Coordinator
U.S. Environmental Protection Agency
Response and Prevention Branch
Caribbean Environmental Protection Division, Region II
1492 Peñuelas De Leon Ave., Suite 417
San Juan, PR 00907-4127

EPA CONTRACT No.: EP-W-06-072

TDD No.: TO-0029-0122

DOCUMENT CONTROL No.: RST 2-02-F-2637

SUBJECT: FINAL PHASE 1 REMOVAL ASSI

FINAL PHASE 1 REMOVAL ASSESSMENT SAMPLING TRIP REPORT, REVISION 1 – PUERTO RICO OLEFINS ASBESTOS SITE, PEÑUELAS.

PUERTO RICO

Dear Mr. Rodriguez,

Enclosed please find the Final Phase 1 Removal Assessment Sampling Trip Report, Revision 1 for the sampling activities conducted on November 21, 2013 and December 13, 2013 at the Puerto Rico Olefins Asbestos Site located in Peñuelas, Puerto Rico. The U.S. Environmental Protection Agency comments regarding the draft version of this deliverable have been incorporated. If you have any questions or comments, please do not hesitate to contact me at (787) 354-2489.

Sincerely,

Weston Solutions, Inc.

Carlos Huertas

RST 2 Site Project Manager

Enclosure

cc:

TDD File No.: TO-0029-0122

FINAL PHASE 1 REMOVAL ASSESSMENT SAMPLING TRIP REPORT, REVISION 1 PUERTO RICO OLEFINS ASBESTOS SITE PEÑUELAS, PUERTO RICO

Prepared for:

U.S. Environmental Protection Agency Region II – Response and Prevention Branch Edison, New Jersey 08837

Prepared by:

Removal Support Team 2 Weston Solutions, Inc. East Division Edison, New Jersey 08837

DC No.: RST 2-02-F-2637 TDD No.: TO-0029-0122 EPA Contract No.: EP-W-06-072

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FINAL PHASE 1 REMOVAL ASSESSMENT SAMPLING TRIP REPORT, REVISION 1

SITE NAME: Puerto Rico Olefins Asbestos Site

DC No.: RST 2-02-F-2637 **TDD No.:** TO-0029-0122

SAMPLING DATES: November 21, 2013 and December 13, 2013

1. Site Location: Peñuelas, Puerto Rico (N18°08'91" W66°43'24.57")

Refer to Attachment A, Figure 1: Site Location Map.

2. Sample Descriptions: Seven bulk samples, including one field duplicate, four soil

samples, including one field duplicate, and 10 wipe samples, including one wipe blank. Refer to Attachment A, Figure 2: Sample Location Map and Attachment B, Table 1: Sample

Collection Information Table.

3. Laboratory Receiving Samples:

Lab Name/Location	Sample Type	Parameters
EMSL Analytical, Inc. 200 Route 130 North Cinnaminson, NJ 08077	Bulk, Soil, and Wipe	Asbestos

4. Sample Dispatch Data:

On November 22, 2013, the first attempt to ship the samples collected from the Puerto Rico Olefins Asbestos Site (the Site) were mistaken rejected by FedEx due to a misinterpretation of the dangerous goods shipping regulations. On November 25, 2013, Weston Solutions Inc., Removal Support Team 2 (RST 2) shipped five bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank, to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under Chain of Custody (COC) No. 00290122-112213-001 and FedEx Airbill No. 871377790608. Refer to Attachment C: Chain of Custody Records and FedEx Airbills.

On December 16, 2013, RST 2 shipped two additional bulk samples to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under COC No. 2-121613-123844-0010 and FedEx Airbill No. 873699443231. Refer to Attachment C: Chain of Custody Records and FedEx Airbills.

5. Personnel On Site:

<u>Name</u>	Representing	<u>Duties On-Site</u>
Angel Rodriguez Carlos Rivera	U.S. EPA, Region II U.S. EPA, Region II	On-Scene Coordinator Air Program Support
Carlos Huertas	RST 2, Region II	Site Project Manager, Field Coordinator, Site QA/QC, Site Health and Safety, Sample
Emilio Betancourt	RST 2, Region II	Collection and Sample Management Sample Collection and Sample Management

6. Site Background:

The Site is located at Road 385, KM 5.4, Tallaboa, Poniente Peñuelas, Puerto Rico. During a visual inspection, the U.S. Environmental Protection Agency (EPA) identified fugitive dust clouds migrating out of the facility during demolition activities conducted by HOMECA Inc. Beginning in 2010 and continuing until the present, an asbestos abatement occurred at the Site. Improper asbestos abatement techniques may have been used at the Site resulting in potential asbestos contamination throughout the Site and in residential neighborhoods downwind of the Site. RST 2 was tasked with conducting multi-media sampling for asbestos at the Site and also at one residential property, one commercial property, and one school downwind of the Site.

7. Removal Assessment Summary:

On November 21, 2013, the EPA On-Scene Coordinator (OSC), and EPA Air Program representative, and RST 2 mobilized to the Site to perform multi-media sampling. As directed by the EPA OSC, RST 2 collected five bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank. Bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using Polarized Light Microscopy (PLM). Soil samples were collected and submitted for asbestos analysis via modified EPA 600/R-93/116 Method using Transmission Electron Microscopy (TEM) with California Air Resource Board (CARB) 435 prep. Wipe samples were collected and submitted for asbestos analysis via American Society for Testing Materials (ASTM) 6480-05 Method. Samples were collected from outside areas where suspected asbestos contamination may have occurred and inside areas where asbestos may have entered the building.

On December 13, 2013, the EPA OSC and RST 2 remobilized to the Site to collect two additional bulk samples. The additional bulk samples were collected from two specific locations as directed by the EPA OSC. The two bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using PLM. Samples were collected from outside areas where suspected asbestos contamination may have occurred. Refer to Attachment A, Figure 2: Sample Location Map for the depiction of where each of the samples were collected from. Refer to Attachment B, Table 1: Sample Collection Information Table for details regarding the locations of each sample collected. Refer to

Attachment D for the Photographic Documentation Log for the Removal Assessment sampling event.

Bulk Sampling:

Bulk presumably asbestos-containing material (PACM) samples were collected from areas on the Site as directed by the EPA OSC. All bulk PACM samples were suspected to have been from insulation that was used at the Site that was left on the ground post-abatement activities. All PACM identified on the Site was suspected to be friable and had the potential of migrating off site. Bulk PACM samples were collected and immediately placed inside two zip-lock bags in order to contain any asbestos fibers inside the bags. Samples were collected utilizing EPA's Environmental Response Team (ERT) Standard Operating Procedure (SOP) No. 2001, General Field Sampling Guidelines.

Soil Sampling:

Three soil sample locations were chosen by the EPA OSC at the Site. Soil samples were collected from the surface at a depth of 0 to 6 inches using polyvinyl chloride plastic scoops. Samples were collected utilizing EPA's ERT SOP Nos. 2001, General Field Sampling Guidelines, and 2012, Soil Sampling.

Wipe Sampling:

Surface dust samples were collected from areas where suspected asbestos contamination may have occurred, such as outdoor areas and nearby open windows inside of buildings, utilizing dedicated Ghost WipesTM. Samples were collected following the general guidance within the HUD Guidelines, Chapter 5: Risk Assessment. Each sample was collected from a 10 cm by 10 cm square (100 cm²) area utilizing EPA ERT SOP Nos. 2001, General Field Sampling Guidelines, and 2011, Chip, Wipe, and Sweep Sampling, as well as NIOSH Method 9100, as guidance.

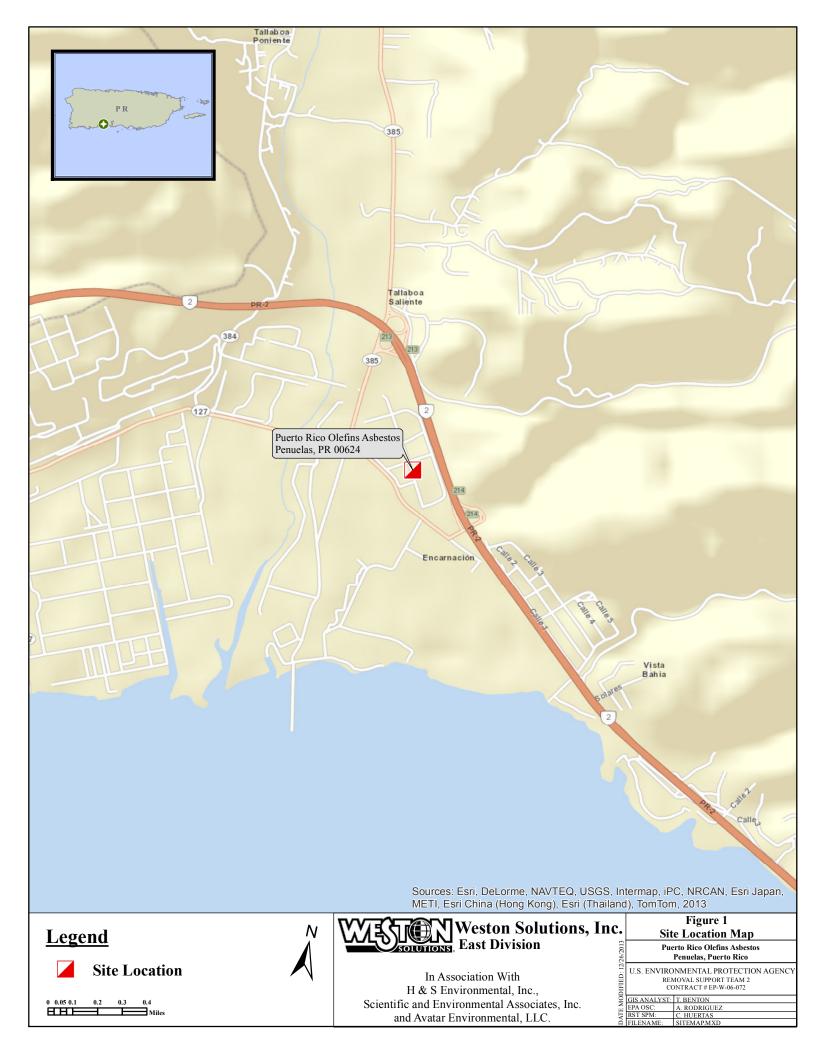
8. Analytical Discussion:

Based on the validated analytical results, asbestos was detected in bulk PACM samples ranging from non-detect to 40 percent (%) amosite and 20% chrysotile, in soil samples ranging from 3 amosite/chrysotile asbestos structures to 9 amosite/chrysotile asbestos structures, and in wipe samples ranging from 7,760 structures per square centimeter (str/cm²) to 374,000 str/cm². The two additional bulk samples collected on December 13, 2013 were both non-detect for asbestos. The wipe blank sample was non-detect for asbestos. Refer to Attachment B, Table 2: Validated Analytical Data Summary – Asbestos Bulk Samples, Table 3: Validated Analytical Data Summary – Asbestos Soil Samples, and Table 4: Validated Analytical Data Summary – Asbestos Wipe Samples.

Report prepared by:	Date:	12/20/13
For Carlos Huertas		, , ,
RST 2 Site Project Manager		
Report reviewed by:	Date:	12/20/13
Timothy Benton		~, 90
RST 2 Operations Manager		

ATTACHMENT A

Figure 1: Site Location Map Figure 2: Sample Location Map





ATTACHMENT B

Table 1: Sample Collection Information Table

Table 2: Validated Analytical Data Summary – Asbestos Bulk Samples

Table 3: Validated Analytical Data Summary – Asbestos Soil Samples

Table 4: Validated Analytical Data Summary – Asbestos Wipe Samples

Table 1: Sample Collection Information Table Puerto Rico Olefins Asbestos Site Peñuelas, Puerto Rico November 21, 2013 and December 13, 2013

		Sample	Sample				
Sample #	Sample Location	Date	Time	Matrix	Collection	Analysis	Sample Type
ACM-001-001	PS 408	11/21/2013	13:18	Bulk	Grab	Asbestos	Field Sample
ACM-001-002	PS 408	11/21/2013	13:21	Bulk	Grab	Asbestos	Field Duplicate
ACM-002-001	PS 410	11/21/2013	13:23	Bulk	Grab	Asbestos	Field Sample
ACM-003-001	Front Flare	11/21/2013	13:30	Bulk	Grab	Asbestos	Field Sample
ACM-004-001	OV 409	11/21/2013	13:44	Bulk	Grab	Asbestos	Field Sample
P0001-ACM005-01	Chimneys East Property	12/13/2013	10:24	Bulk	Grab	Asbestos	Field Sample
P0001-ACM006-01	Metal Pile	12/13/2013	10:34	Bulk	Grab	Asbestos	Field Sample
S0001-0006-001	Front Flare	11/21/2013	13:31	Soil	Grab	Asbestos	Field Sample
S0002-0006-001	Next to Shed	11/21/2013	13:37	Soil	Grab	Asbestos	Field Sample
S0002-0006-002	Next to Shed	11/21/2013	13:39	Soil	Grab	Asbestos	Field Duplicate
S0003-0006-001	Main Entrance	11/21/2013	14:01	Soil	Grab	Asbestos	Field Sample
W-001-001	Front Flare	11/21/2013	13:33	Wipe	Grab	Asbestos	Field Sample
W-002-001	PS 402	11/21/2013	13:47	Wipe	Grab	Asbestos	Field Sample
W-003-001	Scrap Metal Front Crane	11/21/2013	13:50	Wipe	Grab	Asbestos	Field Sample
W-004-001	Crane- Driver Side Front Floor	11/21/2013	13:53	Wipe	Grab	Asbestos	Field Sample
W-005-001	Vertical Concrete	11/21/2013	13:39	Wipe	Grab	Asbestos	Field Sample
W-006-001	Metal Fence Highway	11/21/2013	14:35	Wipe	Grab	Asbestos	Field Sample
W-007-001	Residential House	11/21/2013	14:45	Wipe	Grab	Asbestos	Field Sample
W-008-001	Restaurant- El Velorio	11/21/2013	14:54	Wipe	Grab	Asbestos	Field Sample
W-009-001	Science Classroom	11/21/2013	15:15	Wipe	Grab	Asbestos	Field Sample
W-Blank-001	Blank	11/21/2013	13:00	Wipe	Grab	Asbestos	Wipe Blank

Table 2: Validated Analytical Data Summary - Asbestos Bulk Samples Puerto Rico Olefins Asbestos Site Peñuelas, Puerto Rico November 21, 2013 and December 13, 2013

								Asl	oestos
		Sample	Sample					%	Type
Sample #	Sample Location	Date	Time	Matrix	Collection	Analysis	Sample Type	Amosite	Chrysotile
ACM-001-001	PS 408	11/21/2013	13:18	Bulk	Grab	Asbestos	Field Sample	35	5
ACM-001-002	PS 408	11/21/2013	13:21	Bulk	Grab	Asbestos	Field Duplicate	30	6
ACM-002-001	PS 410	11/21/2013	13:23	Bulk	Grab	Asbestos	Field Sample	None	None
ACWI-002-001	FS 410	11/21/2013	13.23	Duik	Grab	Aspesios	Field Sample	Detected	Detected
ACM-003-001	Front Flare	11/21/2013	13:30	Bulk	Grab	Asbestos	Field Sample	40	2
ACM-004-001	OV 409	11/21/2013	13:44	Bulk	Grab	Asbestos	Field Sample	2	20
P0001-ACM005-01	Chimneys East Property	12/13/2013	10:24	Bulk	Grab	Asbestos	Field Sample	None	None
F0001-ACM003-01	Climineys East Property	12/13/2013	10.24	Duik	Grab	Aspesios	Field Sample	Detected	Detected
P0001-ACM005-01	Metal Pile	12/13/2013	10:34	Bulk	Grab	Asbestos	Field Sample	None	None
F0001-ACM003-01	ivicial Pile	12/13/2013	10:34	Dulk	Grab	Asuestos	rieid Sample	Detected	Detected

Table 3: Validated Analytical Data Summary - Asbestos Soil Samples Puerto Rico Olefins Asbestos Site Peñuelas, Puerto Rico November 21, 2013

Comple#	Sample	Sample	Sample Time	Motnix	Collection	Analyzia	Sample Type	Mineral Type(a)	# of Structures	Analytical Sensitivity	Asbestos Weight
Sample #	Location	Date	Time	Matrix	Collection	Analysis	Sample Type	Type(s)	Detected	70	70
S0001-0006-001	Front Flare	11/21/2013	13:31	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	3	0.1	0.1
S0002-0006-001	Next to Shed	11/21/2013	13:37	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	9	0.1	0.6
S0002-0006-002	Next to Shed	11/21/2013	13:39	Soil	Grab	Asbestos	Field Duplicate	Amosite	3	0.1	< 0.1
S0003-0006-001	Main Entrance	11/21/2013	14:01	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	6	0.1	< 0.1

Table 4: Validated Analytical Data Summary - Asbestos Wipe Samples Puerto Rico Olefins Asbestos Site Peñuelas, Puerto Rico November 21, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Asbestos Type	Asbestos Structures	Sensitivity * (str/cm²)	Concentration (str/cm²)
W-001-001	Front Flare	11/21/2013	13:33	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	21	4,850	102,000
W-002-001	PS 402	11/21/2013	13:47	Wipe	Grab	Asbestos	Field Sample	Chrysotile	4	1,940	7,760
W-003-001	Scrap Metal Front Crane	11/21/2013	13:50	Wipe	Grab	Asbestos	Field Sample	Chrysotile	26	9,710	252,000
W-004-001	Crane- Driver Side Front Floor	11/21/2013	13:53	Wipe	Grab	Asbestos	Field Sample	Chrysotile	5	24,200	121,000
W-005-001	Vertical Concrete	11/21/2013	13:39	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	41	1,940	79,500
W-006-001	Metal fence Highway	11/21/2013	14:35	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	8	1,940	15,500
W-007-001	Residential House	11/21/2013	14:45	Wipe	Grab	Asbestos	Field Sample	Chrysotile	4	4,850	19,400
W-008-001	Restaurant- El Velorio	11/21/2013	14:54	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	77	4,860	374,000
W-009-001	Science Classroom	11/21/2013	15:15	Wipe	Grab	Asbestos	Field Sample	Chrysotile	16	1,940	31,000
W-Blank-001	Wipe Blank	11/21/2013	13:00	Wipe	Grab	Asbestos	Wipe Blank	None	< 2.99	Non Detected	Non Detected

^{*} Due to excessive particulate the analytical sensitivity of 260 str/cm² as required by the method was not reached.

ATTACHMENT C

Chain of Custody Records and FedEx Airbills

Page 1 of 1

USEPA

DateShipped: 11/22/2013 RFP# 272 PO# 0084459

CHAIN OF CUSTODY RECORD

110801110

Contact Name: Smita Sumbaly Site #: 0029 - 0122

Contact Phone: 732-585-4400

Lab Phone: 800-220-3675

Cooler #: 001

Lab: EMSL

No: 00290122-112213-001

Lab# Sample#		Location	Analyses	Watnx	Collected	Cont	Cont Container	Preservanive	
ACM-001-001	301	PS 408	Asbestos	Insulation	11/21/2013	1	Plastic bag		z
ACM-001-002	302	PS 408	Asbestos	Insulation	11/21/2013	-	Plastic bag		z
ACM-002-001	9	PS 410	Asbestos	Insulation	11/21/2013	-	Plastic bag		z
ACM-003-001	ğ	Front Flare	Asbestos	Insulation	11/21/2013		Plastic bag		z
ACM-004-001	20,	OV 409	Asbestos	Insulation	11/21/2013	~	Plastic bag		Z
S0001-0006-001	16-001	Front Flare	Asbestos	Soil	11/21/2013	-	4 Oz glass jar		z
S0002-0006-001	6-001	Next to shed	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		z
80002-0006-002	6-002	Next to shed	Asbestos	Soil	11/21/2013	-	4 Oz glass jar		Z
S0003-0006-001	6-001	Main entrance	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		z
W-001-001		Front Flare	Asbestos	Wipe	11/21/2013	-	Plastic Bag		z
W-002-001		PS 402	Asbestos	Wipe	11/21/2013	-	Plastic Bag		z
W-003-001		Front Crane	Asbestos	Wipe	11/21/2013		Plastic Bag		z
W-004-001		Crane	Asbestos	Wipe	11/21/2013	1	Plastic Bag		2
W-005-001		Vertical concrete	Asbestos	Wipe	11/21/2013	1	Plastic Bag		z
W-006-001		Metal fence highway	Asbestos	Wipe	11/21/2013	•	Plastic Bag		z
W-007-001		Residential House	Asbestos	Wipe	11/21/2013	+	Plastic Bag		z
W-008-001		Restaurant	Asbestos .	Wipe	11/21/2013	1	Plastic Bag		z
W-009-001		Science classroom	Asbestos	Wipe	11/21/2013	1	Plastic Bag		z
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SAMPLES TRANSFERRED FROM CHAIN OF CUSTODY #

Special Instructions: 24 hrs Turn Around Time

Expanded Service International Air Waybill

For FedEx services worldwide including express freight services, dangerous goods, broker select, and letter of credit.

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	company Weston Solutions
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	company EMSL Analytical
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Page 1 of 1

DateShipped: 12/16/2013 RFP# 272 USEPA

CHAIN OF CUSTODY RECORD

Site #: 0029 - 0122

No: 2-121613-123844-0010

Cooler #: 1

Lab: EMSL

Lab # Sample #	Analyses	Matrix	Collected	Sample Time	Numb	Numb Container Cont	Preservative	Lab QC
P0001-ACM005-01	Asbestos	Asbestos	12/13/2013	10:24	-	Plastic bag	None	z
P0001-ACM006-01	Asbestos	Asbestos	12/13/2013	10:34	1	Plastic bag	None	z
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Special Instructions: 24 Hour TAT Preliminary Data. Email results to Carlos.Huertas@WestonSolutions.com, Joel.Petty@WestonSolutions.com, and S.Sumbaly@WestonSoltuions.com

SAMPLES TRANSFERRED FROM CHAIN OF CUSTODY#

Items/Reason	Relinquished by (Signature and Organizati	ion) Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
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Expanded Service International Air Waybill

For FedEx services worldwide including express freight services, dangerous goods, broker select, and letter of credit.

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The World On Time.

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ATTACHMENT D

Photographic Documentation Log

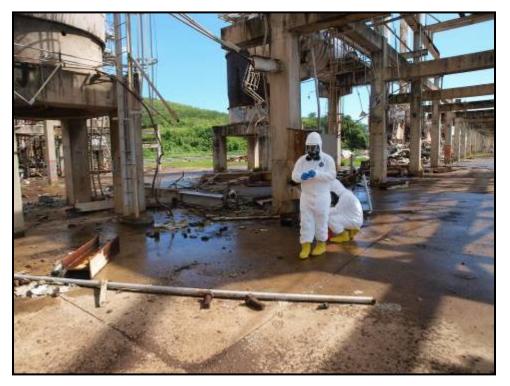


Photo 1: Samples ACM-001-001; ACM-001-002.



Photo 2: Sample ACM-002-001.

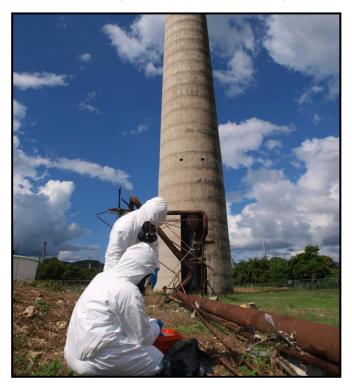


Photo 3: Samples ACM-003-001; S0001-0006-001; W-001-001.



Photo 4: Samples S0002-0006-001; S0002-0006-002.



Photo 5: Sample ACM-004-001



Photo 6: Sample W-002-001.



Photo 7: Sample W-003-001.



Photo 8: Sample W-004-001.



Photo 9: Sample W-005-001.



Photo 10: Sample S0003-0006-001.



Photo 11: Sample W-006-001.



Photo 12: Sample W-007-001.



Photo 13: Sample W-008-001.



Photo 14: Sample W-009-001.



Photo 15: Sample P0001-ACM005-01.



Photo 16: Sample P0001-ACM006-01.